REMARKS

Claims 47, 75, 103, 119 and 124 have been amended to further clarify that the transmission to the maker bank is not through the bank of first deposit for the check, using the words --in a transmission having a transmission path that bypasses-- in place of "being in advance of." Additionally, the transmission by the central system to the various different banks of first deposit is clarified. Finally, claims 119 and 124 have been amended to move limitations that had been in the preambles to the body of the respective claims.

Note that the term "check image data" is intended to be interpreted broadly to cover the images of the front and/or back of a check, with or without a payee endorsement or a bank endorsement.

GROUNDS OF REJECTION

The grounds of rejection to be reviewed are stated in the office action to be:

A. the rejection of claims 47-60, 75-88, 103-116 and 119-139 under 35 U.S.C. § 103(a) as being unpatentable over the five reference combination Geer, U.S. Patent No. 5,930778 (hereinafter Geer), in view of Lowery, U.S. Patent No. 6,189,785 (hereinafter Lowery), in view of Hanaoka et al., U.S. Patent No. 6,257,783, (hereinafter Hanaoka) and further in view of Campbell et al., U.S. Patent No. 5,373,550 (hereinafter Campbell), and further in view of Kitchen et al., U.S. Patent No. 6,289,322 (hereinafter Kitchen). Selected claims will be argued below under separate headings.

ARGUMENT

A. The rejection of claims 47, 75 and 103 under 35 U.S.C. § 103 as being unpatentable over the five reference combination Geer, U.S. Patent No. 5,930778, in view of Lowery, U.S. Patent No. 6,189,785, in view of Hanaoka et al., U.S. Patent No. 6,257,783, (hereinafter Hanaoka) and further in view of Campbell et al. (hereinafter Campbell), U.S. Patent No. 5,373,550, and further in view of Kitchen et al., U.S. Patent No. 6,289,322 is respectfully traversed.

1. The Five-Reference combination does not disclose a central operation for serving multiple different banks of first deposit located between a remote receiving site and the different banks of first deposit and receiving check image data from the remote site, as recited in the claims.

Claims 47, 75, 103 all require the receipt of check data and check image data from a remote site, and processing and subsequent transmitting of the processed data to multiple different banks of first deposit

> *"the central system receiving deposit information for a plurality of different deposit transactions, with the deposit information including for each of the different deposit transactions a deposit account designation, electronic check data and check image data for at least one check to be deposited, wherein the central system is separate from MICR capture, deposit accounting, cash management, and float processing systems for a bank of first deposit and wherein the deposit account designation for each of at least a subset of the plurality of the deposit transactions is to a different bank of first deposit;" "the central system transmitting the electronic deposit data and optionally the check image data for each different deposit transaction of the subset of the plurality of the deposit transactions to a respective different one of the banks of first deposit."*) These limitations are absent from the cited references.

A new reference, Kitchen et al., U.S. Patent No. 6,289,322, has been cited in the Office Action for the proposition that it would be obvious to modify the Geer system to use the CF 140 station of Kitchen as a central system. However, Kitchen teaches away from the claim 47 because it teaches the use of a server CF 140 for the purpose of streamlining the paying of bills by an individual to a regular biller 110 such as a power company. It has nothing to do with handling/processing payment checks, whether paper or electronic, received from the biller. In particular, Kitchen teaches that the server CF 140 can, in one embodiment,

print a hardcopy check, drawn on funds maintained in an account at the server CF 140 or in a payor account in a payor bank 130, and mail the check to the biller (power company) remittance center. In another embodiment, Kitchen teaches that it can perform an electronic funds transfer directly from the payor (individual) customer's account at his/her checking account in payor bank 130 to the biller's (power company's) account at its bank of first deposit 130. See the quotes below:

> *If the payment will be made by electronic funds transfer, the CF processor 410 generates an electronic funds transfer instruction to electronically transfer the appropriate amount from the applicable payor's checking account maintained at one of the financial institutions represented by stations 130a-130c to the appropriate biller's deposit account maintained at one of the financial institutions represented by stations 130a-130c. The processor 410 also generates an instruction to transmit the electronic funds transfer instruction, via the network interface 405, over the network 100 to the applicable payor financial institution station 130a-130c and/or an originating financial institution and or originating financial institution to the Automated Clearing House (ACH) network or similar financial network for funds transfer.*
>
> *The processor 410 also generates, in accordance with the bill payment software instructions stored in memory area 420c, a message indicating the amount of payment remitted and the associated payor account number, along with an instruction to transmit the message, via the network interface 405, over the network 100 to the appropriate biller station 110a-110d. This remittance advice information may flow directly to the biller station 110a-110d or be routed with the payment through the biller's financial institution 130a-130c, which would deliver the information to the biller station. it should be recognized that the biller station to which the payment notice is transmitted may be different than the biller station from which the billing information is transmitted.*
>
> *If the payment will be made by hardcopy check, the CF processor 410 generates an instruction to print a hardcopy check for the appropriate amount against funds in CF station 140's checking account. The applicable payor's checking account maintained at one of the financial institutions represented by stations 130a-130c is debited appropriately via ACH (resulting in electronic funds transfer to the CF station account) or via some form of "good funds" debiting through a*

> *direct electronic connection to the financial institution (resulting in electronic or wire funds transfer to the CF station account). The check may be a "single check" remitting only a single payor's payment to a particular biller, or a "check and list", combining the remittance from multiple payors to a particular biller. Alternatively, the CF processor may generate an instruction to print a hardcopy check for the appropriate amount against funds in the applicable payor's checking account maintained at one of the financial institutions represented by stations 130a-130c. The processor 410 also generates, in accordance with the bill payment software instructions stored in memory area 420c, a message indicating the amount of the payment(s) remitted and the associated payor account(s). The printed message and check are then mailed to the applicable biller remittance center. It should be recognized that the location to which the payment notice is sent may be different than the location of the biller station from which the billing information is transmitted."* Column 9, lines 1-55 of Kitchen. (Emphasis added.)

See also the discussion of the Kitchen operation in Fig. 7 and column 11, line 57 – column 12, line 48. In this Fig. 7, the hardcopy check printing and mailing by the server CF 140 is shown in block 770, while the electronic funds transfer embodiment is shown by block 760.

In the embodiment of Kitchen where the hardcopy check is printed by the server CF 140, the server CF 140 is not receiving deposit information for a plurality of different deposit transactions with the information including electronic check data and check image data. It is teaching away from it by teaching the printing of hardcopy checks and mailing them out, not directly or indirectly to a maker bank to streamline the transfer of funds, but rather to the biller remittance center 110, i.e., the remote system in applicants' claims. Nor is the CF 140 performing one of sorting received checks or error checking the received deposit information. It is not receiving check image data.

In the embodiment of Kitchen where direct electronic funds transfer is made by the server CF 140 from the payor's account 130 to the biller's account 130, again there is no receipt by a central system of electronic check data and check image data. In fact, the biller station 110 (power company) never receives a check in this electronic funds transfer

embodiment (it is a bank-to-bank transfer), so there is nothing to send to a central system to process.

Thus, there is no motivation to modify

Geer [directed to receiving hardcopy checks received by a telephone company or other regular biller, endorsing the checks (column 7, line 51), electronically scanning the checks to obtain the MICR data (column 7, lines 38-47), and then transmitting the electronic information to the depository bank for the telephone company (column 9, lines 11-13)],

with teachings from Kitchen [relating to facilitating ease of payment by an individual to the telephone company by in one embodiment printing hardcopy checks at the server and mailing to the telephone company or doing an electronic funds transfer directly between a payor bank and a bank of first deposit with no checks at all going to the telephone company].

It is settled that the person of ordinary skill in the art "thinks along the lines of conventional wisdom in the art and is not one who undertakes to innovate." *Standard Oil Co. v American Cyanamid Co.*, 227 USPQ2d 293, 298 (Fed. Cir. 1985). It is also settled that, in order to establish a *prima facie* case of obviousness, it is necessary to show that the hypothetical person of ordinary skill would, without any knowledge of the claimed subject matter and without any inventive activity, be motivated to arrive at the claimed subject matter given the guidance of the cited references when each is fully considered as statutorily required. A person of ordinary skill in the art with Geer in front of him/her, would not even consider the Kitchen patent to be pertinent art because it deals with bill-paying from the standpoint of the consumer, not the telephone company. But assuming he did look at Kitchen (which he would not do), Kitchen teaches a server for printing hardcopy checks and sending them to the telephone company or, alternatively, avoiding altogether the processing of checks by the use of an electronic funds transfer between banks. It has no pertinence to the Geer system which relates to the telephone company processing and sending on already received checks.

Referring now to the other references, in applying Geer, the Office Action states that the central system in applicants' claims constitutes the bank of first deposit. This is not correct either in the claim, which is what is being examined, or in applicants' specification.

The examiner points to Fig. 1 of applicants' specification. Actually claim 47 is directed to Fig. 2 of the specification. However, referring to Fig. 1, it is evident that the central system 102 and the bank of first deposit 101 are different entities. The specification defines the bank of first deposit as owning the central site/system or employing the central site/system. See page 12, lines 3-5. The fact that one owns or employs something does not mean that one is that something. The fact that I own a computer and employ that computer for performing work does not mean that I am that computer. The central system is a separate independent system.

Referring to Geer, this patent discloses an operation and a transmission between a check payee receiving station 4 (see Fig. 1 of Geer) to a bank of first deposit 10, and from the bank of first deposit to Federal Reserve Payment System 12 (see column 9, lines 29-41). It does not disclose a central operation in advance of plural different banks of first deposit that services multiple different banks of first deposit, much less one using check image data as part of the transaction in the clearing process with maker banks or a Federal Reserve Bank or correspondent bank.

The Office Action cites column 9, lines 1-25 and column 10, lines 1-6. Those citations are set forth below:

> *In FIG. 1, the image 7 is stored at the payee's location in an archival storage facility 8. However, this image of the check may also be transmitted electronically to the bank along with the other information extracted from the check. The amount of information in the image is typically greater than the transactional information extracted from the MICR line and is added to the electronic record of the check. Thus, transmission of the image requires greater communication capacity than transmission of the transactional check data alone.*
>
> *The information from the electronic scanning 6 performed at the payee's location is transmitted via a suitable communication link 11 to the depository bank 10. At the depository bank, the appropriate adjustments of the payee's account balances by the depository bank are carried out 13. The payee's account is credited with the appropriate amounts as such are compiled by the payee and the information thereof is received electronically from the payee. The electronic check information is sorted and routed via 14, with appropriate*

electronic information added thereto to insure proper routing through the payment and clearing system to the appropriate payor bank. Electronic information of the sorted checks transmitted for particular payor banks, the equivalent of a cash letter, is included with each electronic bundle of checks."

"The image 7 is transferred via a communication link 11 from payee 2 to depository bank 10 for financial information processing and archival storage. This embodiment may be particularly suitable when the payee is a retail establishment receiving numerous point of sale checks but lacking internal accounting facilities."

This does not disclose that the Geer bank of first deposit receives checks to be deposited in other banks of first deposit and performs a transmitting step of the electronic deposit data for each different deposit transaction of the subset of the plurality of the deposit transactions to a respective different one of the banks of first deposit. Note that it would make no sense for the bank of first deposit 10 in Geer to transmit deposit data to other banks of first deposit. Also, note that this transmitting to a plurality of different banks of first deposit limitation in the claim is never mentioned in the rejection!

Note that large sections of the Office Action relate to elements that are not in the claims and thus these paragraphs in the Office Action will not be responded to. However, these paragraphs do cite additional references. Accordingly, for the record, Hanaoka relates to a printer and a printer control method which may be used to print checks. Note that the reference has no pertinence since the limitation that it was cited for by the examiner was dropped in a previous response.

Lowery relates to point of sale operations and transmissions of check data with no transmissions to banks of first deposit. The only communication with a bank of first deposit is by the ACH/Federal Reserve system. See element 126 in Fig. 2b.

Campbell discloses transmissions between a bank of first deposit 36 and a payor (maker) bank 34. See Figs. 1 and 2 and column 2, lines 36-49, which clarify that the disclosed operation is for check clearing, not operation as a central receiving and distribution site in advance of and operating to transmit to multiple different banks of first deposit in multiple different deposit procedures.

Since none of the references disclose this feature of transmission to multiple different banks of first deposit, the combination of these references, even if they could be combined to obtain an operable system (which they cannot), and even if there was a motivation in the art to one of ordinary skill to take these references and create an operable system that meets this limitation (which there is not), would still not supply this deficiency.

The office action at page 5 states that Geer does not disclose the situation where the central system is not a bank of first deposit for these checks. The examiner then argues that employing a central system to handle deposited checks is well known in the art, so that it "would have been obvious to one of ordinary skill in the art at the time the invention was made to modify Geer's system to incorporate the feature above for the purpose of providing more efficiency in processing the deposited checks." However, there is no possible reason why a bank of first deposit would set up a central system to process checks for other unrelated banks of first deposit. Thus, such a modification is not obvious in Geer and would not provide "more efficiency on processing the deposited checks" in the Geer operation.

2. **The transmitting step from the central system directly or indirectly to the maker bank or a Federal Reserve Bank or a correspondent bank and bypassing the MICR capture, deposit accounting, cash management, and float processing** systems of **the bank of first deposit**

> *"the central system transmitting electronic check data and the check image data directly or indirectly to a maker bank or a Federal Reserve Bank or a correspondent bank with the transmitting bypassing the MICR capture, deposit accounting, cash management, and float processing systems of the bank of first deposit for that deposit transaction."* **is not disclosed in the prior art.**

The language for this element covers direct and indirect transmissions from the central system to the maker bank or the Federal Reserve Bank or correspondent bank but with this transmission bypassing the recited systems of the bank of first deposit.

The Office Action cites column 9, lines 18-25 of Geer for disclosing this claim element. The entire paragraph at column 9, lines 11-25 is recited below to show the context of the cited section:

> *"The information from the electronic scanning 6 performed at the payee's location is transmitted via a suitable communication link 11 to the depository bank 10. At the depository bank, the appropriate adjustments of the payee's account balances by the depository bank are carried out 13. The payee's account is credited with the appropriate amounts as such are compiled by the payee and the information thereof is received electronically from the payee. The electronic check information is sorted and routed via 14, with appropriate electronic information added thereto to insure proper routing through the payment and clearing system to the appropriate payor bank. Electronic information of the sorted checks transmitted for particular payor banks, the equivalent of a cash letter, is included with each electronic bundle of checks."*

What is evident from the paragraph of Geer is that the depository bank 10 is routing the electronic check information into the payment and clearing system. In other words, the depository bank is not being bypassed, but is actually initiating the routing. This is a direct teach-away from the claim element that the MICR capture and accounting programs in the bank of first deposit are to be bypassed in the transmission path from the central system to the maker bank. The advantage of the limitation is not only significantly reducing delay in the processing, but also the enhancement of security by eliminating the possibility of the insertion of virus,' Trojan horses, or other malicious code while the image and attendant data is passing through the computer links and processing of a bank of first deposit.

As noted in the previous response, check image data is not in any transmission of the check data going to the payment and clearing system. Geer teaches the creation of an image of a check for archive purposes, and further teaches that the check image "may also be transmitted," i.e., it is optional, to the bank of first deposit. With the optional nature of such data, the check image could not be used as a part of the presentment process at the maker bank.

The sum of the individual citations in this five reference combination, even if they could be combined piecemeal (which they cannot because there is a fundamental lack of motivation to combine to obtain applicants' claimed invention) still do not meet the claim as a whole with its image data, its transmission to multiple different banks of first deposit, and its transmissions directly or indirectly to the maker bank or the Federal Reserve Bank or correspondent bank but bypassing the MICR capture, deposit accounting, cash management, and float processing systems of the bank of first deposit, in the context of the other elements.

A prima facie case of obviousness has not been made out per the MPEP and withdrawal of the rejection is respectfully requested.

The foregoing explanation applies equally to claim 75 (program product format), which tracks the limitations of claim 47 in substantial aspects, as well as to claim 103 (system format) which tracks the limitations of claim 47 in substantial aspects. Note that there are numerous dependent claims which are allowable in their own right. Only selected dependent claims will be argued at this time.

Regarding claims 52 and 53, which include various limitations relating to determining whether a maker bank requires a hard copy of a check, the Office Action that Geer does not disclose such a limitation, but cites Campbell at column 3, lines 45-52 to make up for this deficiency. However, this citation of Campbell makes no reference to a print site. Moreover, Geer teaches away from such a combination with its statements at column 4, lines 1-9, and the description of Geer's first embodiment where the paper checks are destroyed (column 7, lines 26-27) and Geer's second embodiment where the paper checks are not printed at a remote site but rather are physically transported to the maker bank (column 10, lines 50-52).

Regarding claim 54 relating to non-storage if an error is detected, the examiner's comments cannot stand in view of the analysis provided above for the deficiencies of Lowrey.

Regarding claim 55 relating to an electronic notification that a deposit is complete, the examiner cites Geer at column 9, lines 45-50. However, this citation in Geer relates to check dishonors by the payor bank, which is the opposite of completing a deposit at a bank of first deposit.

Regarding claim 58 relating to returns, the examiner cites Geer at column 9, lines 45-50. However, there is no reference in this citation to return check image data being sent. Likewise, the rejection of claim 59 that relates to sending return check image data directly or indirectly to the maker bank, fails for the same reason.

Claim 60 relates to determining, in a re-presentment context, whether a hard copy of the check is required. The examiner cites Geer at column 9, lines 45-50 as meeting this limitation. However, this citation of Geer does not disclose such a hard copy determination. It refers to transmission of electronic information.

Regarding claim 119 that relates to multiple remote sites, the examiner cites Geer at column 7, lines 4-25. However, Geer does not disclose "endorsing and/or voiding the one or more checks to obtain endorsed and voided checks;" or "creating an image of each of a plurality of the endorsed and/or voided checks to obtain endorsed and/or voided check image data;" or "electronically associating the electronic deposit data, the electronic check data and the original check image data and the endorsed and/or voided check image data;" or "transmitting the electronically associated electronic check data and the original check image data and/or the endorsed and/or voided check image to the central system." Geer only provides for adding endorsement information to the electronic record (see Geer at column 7, lines 50-53), not the check itself and does not create an image of this endorsed check, nor electronically associate this endorsed check image with the other data. Thus, the rejection of this claim cannot stand. The examiner states that Geer discloses "the plurality of remote sites are similar to the steps in claim 47 above." However, similarity is not the test and would not be upheld in court. With respect to claim 47, the Office Action mentions Campbell in the context of endorsements. However, Campbell does not disclose an endorsement step, much less an endorsement step at a remote site. Campbell discloses only transmissions between banks.

Regarding claim 121, the examiner states that this limitation regarding determining whether the endorsement information at the remote cite is up-to-date, and if not, then downloading the up-to-date information is obvious. It is timely requested that the examiner substantiate this statement per MPEP 2144.03. This is the second request.

Regarding claim 122 relating to comparing an amount of one or more checks against a deposit maximum, and providing a notice if the deposit exceeds the maximum, the examiner cites Geer at column 9, lines 52-63. However, this citation relates to account balances in checking accounts or savings accounts and contains no reference to a deposit maximum or sending out a notice. Account balances in checking accounts and savings accounts have no relation to a deposit maximum.

Claim 123 relates to the remote site receiving return check image data. The rejection of the examiner relies on Geer at column 9, lines 45-50 and fails for the same reason as the other return claims discussed above.

Claim 135 relates to the central system sending endorsement information to the remote site. The examiner cites Geer at column 11, lines 40-45 to meet this limitation. However, this citation has nothing to so with sending endorsement information, much less sending it from the central system.

It is noted that the Examiner has in the past taken official notice of a number of limitations in accordance with MPEP 2144.03, applicants traverse/challenge these official notice statements based on personal knowledge and request that each point of official notice be supported by a citation to a reference, as set forth by the MPEP Office requirements. This traverse of the official notice is made insofar as these statements of official notice are applied to the claims as amended.

EVIDENTIARY DECLARATION

Additionally, an evidentiary declaration has been provided from Mr. Danne Buchanan, the Chief Executive Officer of NetDeposit Inc., the assignee of this application, and Executive Vice President of E-Business Solutions Group for Zions Bancorporation, a bank holding company that operates more than 325 full-service banking offices throughout the western United States. Mr. Buchanan has 27 years of banking industry experience and was very familiar with competitor check processing operations and competitor thinking at the time of the invention.

Mr. Buchanan has studied the examiner's November 23, 2004 Office Action, as well as the four patents cited by the examiner, namely, Geer, U.S. Patent No. 5,930778, Lowery, U.S. Patent No. 6,189,785, Hanaoka et al., U.S. Patent No. 6,257,783, and Campbell et al. U.S. Patent No. 5,373,550. Based on his 27 years of experience in the banking industry and his knowledge of the ordinary level of skill in the banking industry at the time of the invention, Mr. Buchanan has rendered his opinion that one of ordinary skill in the banking art at the time of the invention would not have been motivated to combine the teachings of the four patents Geer, Hanaoka, Lowery and Campbell to realize any of claims 47, 75 and 103 herein. Specifically, Mr. Buchanan has rendered his opinion that there is no possible reason why a bank of first deposit would set up a central system to process checks for other unrelated banks of first deposit, so that such a modification is not obvious in Geer and would not provide "more efficiency in processing the deposited checks" in the Geer operation.

Additionally, based on his 27 years of experience, his knowledge of the banking industry at the time of the invention and his study of the four cited patents, Mr. Buchanan has stated his firm opinion that the concept of bypassing, i.e., transmitting in advance of the bank of first deposit MICR capture, deposit accounting, cash management, and float processing systems in a transmitting step that transmits both the electronic check and the check image data to the maker bank is not done in the banking industry and is now and at the time of the invention would have been counter-intuitive because the bank of first deposit MICR capture and/or accounting programs (as is done on Geer) control most aspects of the check clearing process. The advantage of the *"being in advance of MICR capture, deposit accounting, cash management, and float processing systems of the bank of first deposit"* limitation is that it not only significantly reduces delay in the processing by the maker bank, but it also enhances security by eliminating the possibility of the insertion of virus,' Trojan horses, or other malicious code while the image and attendant data is passing through the computer links and processing of these systems in the bank of first deposit.

Additionally, based on his 27 years of experience, his knowledge of the banking industry at the time of the invention and his study of the four cited patents, Mr. Buchanan has stated his firm opinion that Geer clearly teaches that the Geer optional check image is not used as a part of the presentment process at the maker bank and that there is no recognition of the use of an image as a fundamental part of the transaction with the maker bank or Federal Reserve Bank or correspondent bank, and importantly, that Geer is a direct teach-away from

the claim element that the accounting programs in the bank of first deposit are to be bypassed in the transmission path from the central system to the maker bank. Thus, Mr. Buchanan concludes that it is his firm opinion that there would be no motivation in one of ordinary skill in the art at the time of the invention to modify Geer to now transmit to the maker bank with the transmission "being in advance of the MICR capture, deposit accounting, cash management, and float processing systems of the bank of first deposit."

Thus, based on his 27 years of experience, his knowledge of the banking industry at the time of the invention and his study of the four cited patents, Mr. Buchanan has stated his firm opinion that there is no motivation to combine the four references cited by the examiner to realize claim 47, and that the sum of the individual citations in this four reference combination still do not meet the claim as a whole with its image data, its transmission to multiple different banks of first deposit, and its transmissions directly or indirectly to the maker bank or the Federal Reserve Bank or correspondent bank but bypassing, i.e., transmitting in advance of the *MICR capture, deposit accounting, cash management, and float processing systems* of the bank of first deposit, in the context of the other elements.

Mr. Buchanan also provided evidence of substantial commercial success of the invention defined by claims 47, 75 and 103, despite the legal requirements to have agreements in place with the millions of potential checkmakers before the invention defined in numbered paragraph 4 could be implemented, a significant practical impediment to implementation.

Then based on his 27 years of experience, his knowledge of the banking industry at the time of the invention and his study of the four cited patents, Mr. Buchanan rendered his firm opinion that the claims 47, 75 and 103 were novel and non-obvious to one of ordinary skill in the banking art at the time of the invention.

In view of the foregoing amendments and remarks, the application is ready for allowance.

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

Appl. No. 09/560,779
Atty. Dkt. No. 057898-0102

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. § 1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

Date May 10, 2006

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